

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMBAC ASSURANCE CORPORATION'S INFORMATIVE MOTION REGARDING  
MARCH 4-5, 2020 OMNIBUS HEARING**

Ambac Assurance Corporation ("Ambac") hereby submits this informative motion in compliance with the *Order Regarding Procedures for Attendance, Participation and Observation of March 4-5, 2020, Omnibus Hearing* [Dkt. No. 11729], and respectfully states as follows:

1. Dennis Dunne, Atara Miller, and Grant Mainland of Milbank LLP will appear on behalf of Ambac at the March 4-5, 2020 omnibus hearing in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801)

2. Mr. Dunne, Ms. Miller, and Mr. Mainland will speak in connection with (1) *Objection and Reservation of Rights of Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, Ambac Assurance Corporation, Financial Guaranty Insurance Company, and Invesco Funds With Respect to Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Spanish Translation of the Disclosure Statement, (III) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, and (IV) Granting Related Relief (ECF. No. 10808) [Dkt. No. 11095, Case No. 17-3283]; (2) Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company's Opposition to DRA Parties' Motion and Memorandum of Law in Support of Their (I) Notice that the DRA is a Party in Interest and Can Participate in the Monlines' Amended Lift Stay Litigation and Request to Modify the Amended Revenue Bond Scheduling Order or, (II) in the Alternative, Motion to Permit the DRA Parties to Intervene in the Monolines' Amended Lift Stay Litigation (ECF No. 10835) [Dkt. No. 11126, Case No. 17-3283]; (3) Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company's Limited Objection to the Joint Stipulation Regarding (I) the DRA Parties' Motion and Memorandum of Law in Support of their Motion for Relief From the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection (ECF No. 7643); and (II) the DRA Parties' Motion and Memorandum of Law in Support of Their Notice that the DRA is a Party in Interest and Can*

*Participate in the Monolines Amended Lift Stay Litigation (ECF No. 11285) [Dkt. No. 11325, Case No. 17-328]; (4) Urgent Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, Financial Guaranty Insurance Company, and National Public Finance Guarantee Corporation, as Holders and Insurers of HTA Bonds, to Compel Production of Documents Concerning Preliminary Hearing on Lift-Stay Motion (ECF No. 10102) [Dkt. No. 11686, Case No. 17-3283]; (5) Urgent Motion of Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Financial Guaranty Insurance Company to Compel Production of Documents Relating to the Preliminary Hearing on the CCDA and PRIFA Lift-Stay Motions [Dkt. No. 11687, Case No. 17-3283]; (6) Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company's Opposition to DRA Parties' Motion and Memorandum of Law in Support of their Motion to Intervene in the Revenue Bond Adversary Proceedings with Respect to the Clawback Complaint (ECF No. 11) [Dkt. No. 18, Case No. 20-00005]; (7) Opposition of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Financial Guarantee Insurance Corporation, and Financial Guaranty Insurance Company to the Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations [Dkt. No. 19, Case No. 20-00005]; (8) Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company's Opposition to DRA Parties' Motion and Memorandum of Law in Support of their Motion to Intervene in HTA Revenue Bond Adversary Proceeding with Respect to the Lien Stripping Complaint (ECF No. 14) [Dkt. No. 21, Case No. 20-00007]; (9) Opposition of Assured Guaranty Corp., Assured Guaranty Municipal Corp.,*

*Ambac Assurance Corporation, National Public Finance Guarantee Insurance Company, and Financial Guaranty Insurance Company to the Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations* [Dkt. No. 22, Case No. 20-00007]; (10) *Opposition of Assured Guaranty Corp., Ambac Assurance Corporation, and Financial Guaranty Insurance Company to the Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations* [Dkt. No. 15, Case No. 20-00003]; (11) *Opposition of Assured Guaranty Corp., Ambac Assurance Corporation, and Financial Guaranty Insurance Company to the Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations* [Dkt. No. 17, Case No. 20-00004].

3. Mr. Dunne, Ms. Miller, and Mr. Mainland also reserve the right to be heard on any matter raised by any party at the hearing related to the Title III cases, or any adversary proceeding pending in the Title III cases, or the interests of Ambac.

WHEREFORE, Ambac respectfully requests that the Court take notice of the foregoing.

Dated: February 28, 2020  
San Juan, Puerto Rico

**FERRAIUOLI LLC**

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***Attorneys for Ambac Assurance Corporation***

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

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